

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

MICHAEL MACKIE,)	
)	
Plaintiff,)	
)	
v.)	Case No. _____
)	
PENTAGON FEDERAL CREDIT)	
UNION,)	
)	
EXPERIAN INFORMATION)	
SOLUTIONS, INC.)	
)	
and)	
)	
TRANSUNION, LLC)	
)	

NOTICE OF REMOVAL

COMES NOW, the Defendant, Pentagon Federal Credit Union (“PenFed”), and hereby gives notice of the removal to this Court of the case styled *Michael Mackie v. Pentagon Federal Credit Union, et al.*, Case No. 2024-08356, from the Circuit Court of Fairfax County, Virginia, pursuant to 28 U.S.C. § 1331 and 1441, based upon the following grounds:

1. On June 12, 2024, Michael Mackie (“Plaintiff”) filed a complaint against PenFed, Experian Information Solutions, Inc. (“Experian”), and TransUnion, LLC, in the Circuit Court of Fairfax County, Virginia, under Case Number 2024-08356.
2. Copies of the pleadings filed in this action are attached hereto as Exhibit 1, as required under 28 U.S.C. § 1446(a).
3. On June 14, 2024, PenFed was served with Plaintiff’s Complaint. (Compl., Ex. 1).
4. PenFed’s removal of this action is timely under 28 U.S.C. § 1446(b) because this notice is being filed less than 30 days after PenFed was served with the complaint.

5. This action is properly removed to this Court under 28 U.S.C. § 1441 because this district/division embraces the place where the complaint is pending.

6. Plaintiff's Complaint purports to set forth a cause of action under the Fair Credit Reporting Act, 15 U.S.C. § 1681 *et seq.* (*See* Compl., Ex. 1 at ¶ 1). Therefore, this Court possesses original jurisdiction pursuant to 28 U.S.C. § 1331 and removal is proper.

7. No other defendant has been properly joined and served and therefore consent to removal is not required. *See* 28 U.S.C. § 1446(b)(2)(A).

8. Pursuant to 28 U.S.C. § 1446(d), PenFed will promptly file a copy of this notice of removal with the Circuit Court of Fairfax County, Virginia, and serve it on all counsel of record in the state court proceeding.

Respectfully submitted,

Dated: July 8, 2024

PENTAGON FEDERAL CREDIT UNION

/s/ Constantine E. Politis

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